5.0. IMPACT OVERVIEW

5.1. SIGNIFICANT, UNAVOIDABLE ENVIRONMENTAL EFFECTS

Section 15126 of the State CEQA Guidelines requires the EIR to disclose the "significant environmental effects that cannot be avoided if the proposed project is implemented." Section 15126.2(b) further states:

> Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

The Executive Summary included in this EIR describes all the potential impacts of the proposed project, including the significant impacts. As described in the Executive Summary, the only unavoidable significant impacts of the proposed project are to air quality. Construction of the proposed project would generate ROG and NOx in excess of the San Joaquin Valley Air Pollution Control District (SJVAPCD) thresholds of significance.

5.2. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126 of the State CEQA Guidelines requires the EIR to disclose the "significant irreversible environmental changes which would be involved in the proposed project should it be implemented." Section 15126.2(c) further states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitment of resources should be evaluated to assure that such current consumption is justified.

Implementing the proposed project would result in the following irreversible environmental changes:

- Physically converting approximately 220 acres of vacant and mostly undeveloped land to a mixed-use built environment. This includes altering the site's topography, vegetation, and drainage patterns.

- The conversion of approximately 110 acres of Prime Farmland to non-agricultural uses.

- Utilization of building materials and human resources for construction of the project. Many of the resources utilized for construction are nonrenewable,

including manpower, sand, gravel, earth, iron, steel, and hardscape materials. Other construction resources, such as lumber, are slowly renewable.

- Commitment of energy and water resources as a result of the construction and operation and maintenance of the proposed development. Much of the energy that will be utilized onsite will be generated through combustion of fossil fuels, which are nonrenewable resources.

5.3. GROWTH-INDUCING IMPACTS

Section 15126 of the State CEQA Guidelines requires the EIR to examine the "growth-inducing impact of the proposed project." The intent of this section is to "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment (State CEQA Guidelines § 15126.2[d])." Growth-inducing impacts are caused by those characteristics of a project that foster or encourage population and/or economic growth. These characteristics include adding residential units, expanding infrastructure, and generating employment opportunities. The following discussion addresses the project's potential for growth-inducing impacts.

Addition of Residential Units and Commercial Space

The project would add approximately 1,084 residential units to the City's housing stock, which is expected to add 2,970 residents to the City's population (based on the City's average of 2.74 residents/owner-occupied household, as identified by the State Department of Finance). This represents a 4.7 percent increase to the City's total population, which the California Department of Finance reports is currently 62,817 persons.

This direct increase to the City's population is not a significant impact. Rather, the increase to the City's housing stock is accommodating the growth that is being experienced in the City and region-wide. This level of growth is planned for by both the San Joaquin Association of Governments and the City of Lodi. The City's adopted General Plan anticipates and accommodates this growth, and the proposed project is consistent with the growth planned for in the General Plan.

Furthermore, the proposed development provides commercial, recreational, and educational amenities onsite, which reduces the need to develop these facilities offsite. The proposed commercial space consists of up to 350,000 ft^2 of neighborhood commercial uses within the proposed mixed-use activity center. The intent of these commercial uses is to provide retail outlets and services that would serve the proposed residential units. This type of commercial development is growth accommodating.

Expansion of Infrastructure

Expanding infrastructure can induce growth by removing development obstacles. For instance, if an area's growth is limited by water supply, development of water supply facilities could allow addition growth in the service area. Similarly, new freeway interchanges, transit stops, wastewater facilities, and infrastructure improvements could allow growth in areas that were previously inaccessible or underserved.

The proposed project includes the expansion of infrastructure. Proposed infrastructure improvements include:

- On- and offsite roadway improvements;
- Connections to electricity, telephone, and cable services;
- Individual unit, and development-wide, connections to the existing water and wastewater infrastructure;
- Sewer; and
- Flood control.

These proposed improvements are sized to serve the planned development, and are not oversized in a way that would encourage offsite development. The proposed infrastructure expansion and connections would serve growth anticipated in the City's General Plan. While the proposed infrastructure improvements include offsite facilities that could be utilized by future development in the area, including regional wastewater lines as shown in Figure 3.11.3, the project's improvements do not eliminate the physical obstacles to off-site development. Future development in the area would still require substantial additional infrastructure improvements, and would require additional discretionary actions of San Joaquin County, the City of Lodi, and/or LAFCO. Therefore, the project's improvements are not considered growth inducing.

Since the project is growth-accommodating rather than growth-inducing; is consistent with the City's General Plan and the growth forecasts for the region; and the infrastructure improvements included in the project would not eliminate development obstacles, the project would not have significant growth-inducing impacts.

5.4. SUMMARY OF CUMULATIVE IMPACTS

CEQA Guidelines Section 15130(a) states that, "an EIR shall discuss cumulative impacts of a project when the project's incremental effects is cumulatively considerable, as defined in CEQA Guidelines Section 15065(c)." This discussion, as stated by CEQA Guidelines Section 15130 (b), "should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified and other projects contribute, rather than the attributes of other projects which do not contribute to the cumulative impact."

In accordance with CEQA Guidelines Section 15130(b)(1)(B), the cumulative impact analysis for the proposed project is derived from a list of pending, approved, and reasonably foreseeable projects within the City and other surrounding cities, or from the growth forecasts contained in the City's General Plan, as appropriate to the issue area.

The following is a summary of the cumulative impacts identified in the EIR:

Air Quality

The project would generate ozone precursors (NOx and ROG) at levels that are significant, constituting cumulatively considerable net increases of non-attainment criteria pollutants for the San Joaquin Valley Air Basin. Therefore, the project will significantly contribute to a cumulative air quality impact by exceeding Ambient Air Quality Standards (AAQS).

In regards to local air quality, the analysis conducted indicates that, even with the addition of carbon monoxide (CO) generated by the project and other development projects in the vicinity, peak localized CO levels would remain well below the air quality standards. Therefore, there would be no significant cumulative impacts to localized air quality from CO pollution.

Biological Resources

The City of Lodi and surrounding region are experiencing growth. Multiple development projects are proposed, approved, or currently under construction in the City and region. These projects are causing a loss of open space in the region which can adversely affect biological resources. The proposed project would contribute to this cumulative loss of open space by developing 220 acres of mostly agricultural land.

Since the loss of open space being experienced is region-wide, and development pressures affect the entire region, the most effective mitigation is a regional planning effort to conserve biologically valuable open space. Fortunately, an effort to preserve biological resources in San Joaquin County is underway – the San Joaquin County Multi-species Habitat Conservation and Open Space Plan (SJMSCP). The SJMSCP will preserve a substantial amount of open space in the region, particularly open space that is highly valuable to biological resources. The project's participation in the SJMSCP, which is a required mitigation measure, will result in the payment of funds that will be used to conserve open space.

Cultural Resources

One historic building and other structures of unknown historical value have been identified on the project site isolated from other past, current and probable future projects. However, mitigation measures have been included in this EIR that ensure that the proposed project would not substantially change the significance of any historical, archeological, or paleontological resources.

Geology and Soils

The effects the proposed action will have on geology and soils are limited to the project site. Alteration of geological materials onsite will not affect the suitability of geologic materials elsewhere in the region. Therefore, the proposed project will not contribute to significant cumulative geology or soil impacts.

Hazards and Hazardous Materials

The conversion of the project site from dormant agricultural uses to a mixed-use development would have a positive effect on the potential hazards in the region by eliminating potential hazardous materials associated with the past storage of fertilizers, chemicals, and other compounds on the project site. The proposed development would not be considered a hazardous waste generator, nor would it involve the transport, storage and/or disposal of hazardous materials. The project would also not overtly expose future residents and project occupants to railroad-related hazards since there are ample buffer areas adjacent to the railroad right-of-way. Therefore, the proposed project would not contribute to any cumulative hazardous conditions or any cumulative hazardous material impacts.

Hydrology

Water Quality

The only water pollutants that could be released from the project site include runoff induced sediment, vehicle and equipment fluids, household chemicals, trash, landscaping byproducts, and other typical urban stormwater pollutants. The NPDES was established to regulate stormwater pollution. In accordance with NPDES, San Joaquin County and the City of Lodi has implemented a Stormwater Management Plan (SMP) for urban runoff.

The SMP is a regional plan designed to reduce the pollutant levels of receiving waters. Thus, the plan is intended to achieve a cumulative reduction in water pollutants. Compliance with this SMP ensures the project would not substantially contribute to cumulative water quality impacts.

Flooding and Drainage Systems

The proposed project would alter the site's drainage pattern and install an engineered drainage system to manage onsite stormwater flows. Therefore, the proposed project will not impact the City's currently constructed overall storm drain collection system, because the collection will be managed locally.

Groundwater

As discussed above in Impact 3.6.6, the proposed project would contribute an existing overdraft of the groundwater basin. As outlined in the City's 2005 Urban Water Management Plan, the City draws groundwater in excess of 17,000 acre-feet (AF) per year, which has been determined to exceed the historical safe draw volume of 15,000 AF per year. The proposed project would rely on groundwater as the sole water source for Phase I until the year 2010. After 2010, an additional 6,000 AF of water per year would become available from water rights the City has purchased from WID. These additional water rights alone would reduce the City's dependence on the groundwater basin to an acceptable level.

As described in the project's Water Supply Assessment (included in Appendix I of this EIR), Phase I of the proposed project is projected to use 137 AF of water per year, and

the entire Reynolds Ranch Project is anticipated to require about 510 acre-feet (AF) of water annually. This incremental increase to the City's overdraft of the groundwater basin is not cumulatively considerable. The City's 2005 Urban Water Management Plan outlines the City's approach to supplying water to its constituents through the year 2030. As shown in this Urban Water Management Plan, the City's water supply program will meet the demands of the City, including the demands of the proposed project and other anticipated growth, while reducing the City's dependence on the groundwater basin to less than 15,000 AF per year.

Noise

A number of roadway segments will experience significant noise level increases compared to existing noise levels at the same locations. These include cumulatively significant traffic noise level increases in 2030 along Frontage Road and Harney Lane. These cumulatively significant noise impacts will be mitigated by the required inclusion of perimeter walls on new residential development that abuts Harney Lane. Additional mitigation includes upgraded structural protection for residential structures (habitable second-story residential space) including dual-paned windows and supplemental ventilation (air conditioning) allowing for window closure.

Public Services

The City of Lodi is experiencing growth, and several other development projects in the City are being considered on a similar time schedule. The cumulative impacts these projects will have on services are greater than the individual impacts the Reynolds Ranch Project will have. However, the City's growth is consistent with expectations identified in the City's General Plan. As such, the service providers have been fully informed of cumulative projects. In addition, the service purveyors and the City of Lodi, to share the costs and fully mitigate the impacts of additional services, have developed development impact fees. With the payment of these development impact fees, the proposed project would not have a significant cumulative impact on public services.

Traffic and Circulation

The proposed project's traffic plus cumulative traffic generation would be significant and would result in unacceptable levels of service at various intersections. However, with implementation of mitigation measures identified in Chapter 3.10 of this EIR, the project's contribution to the cumulative traffic scenario would not be significant. See Chapter 3.10 for additional cumulative traffic impacts details. This chapter fully describes existing, near-term, and longer-term cumulative traffic conditions.

Utilities and Service Systems

The proposed project would increase the demand for water, wastewater, energy, and natural gas services. The impact analysis in Section 3.11 of the EIR considers the project's incremental increase in service demand in conjunction with the demand generated by existing development and planned and projected growth. In addition, the project's contribution to cumulative impacts on utility and service systems are analyzed in Section 3.11. With the incorporation of the mitigation measures identified in Section

3.11 the proposed project would not cause the cumulative impacts on utility and service systems to be significant.